

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

MIDWEST PILOTS MERGER)	
COMMITTEE,)	
CARL SCHWERMEN,)	
DONALD TILL,)	
<i>and</i>)	
MARK E. WARD,)	
<i>Plaintiffs,</i>)	Civil Action No. 2:14-cv-01441-RTR
)	
<i>v.</i>)	
)	
FRONTIER AIRLINES, INC.)	
<i>and</i>)	
FRONTIER AIRLINE PILOTS)	
ASSOCIATION,)	
<i>Defendants.</i>)	
)	

**UNOPPOSED MOTION BY PLAINTIFFS FOR AN EXTENSION
OF TIME TO RESPOND TO MOTIONS TO DISMISS**

Plaintiffs Midwest Pilots Merger Committee (MPMC) *et al.* respectfully request that they be granted an extension of time in which to file their oppositions to defendants' separate motions to dismiss. Plaintiffs' oppositions are due on or before February 9, 2015, and by this motion plaintiffs ask that they be granted an extension of four days to and including February 13, 2015, in which to file their oppositions. Plaintiffs state as follows in support of this motion.

Defendants Frontier Airlines, Inc. and Frontier Airline Pilots Association filed separate motions to dismiss on January 16, 2015, serving those motions through the court's electronic filing system. Plaintiffs, therefore, have to and including February 9, 2015, in which to file their responses to those motions. Since there are no genuine disputed facts relevant to defendants' motions to dismiss Count I of the Complaint, and since plaintiffs' opposition to that portion of defendants' motions will show that plaintiff MPMC is entitled to judgment in its favor on Count I, plaintiffs have

been preparing such a motion along with their opposition to defendants' motions. Plaintiff MPMC's motion for partial summary judgment is almost complete and will be filed by February 9th, but plaintiffs need a few more days to complete their opposition to the motions to dismiss to address Count II of the Complaint. By this motion they ask for an additional four days in which to file those oppositions.

Counsel for plaintiffs has informed counsel for defendants that this motion would be made and has been authorized to state that defendants will not oppose this motion if plaintiffs agree that defendants should have to and including March 31, 2015, in which to file their oppositions to the motion for partial summary judgment and their replies to plaintiffs' opposition to their motions to dismiss. Plaintiffs have agreed to that request.

WHEREFORE, plaintiffs respectfully request that they be granted an extension of four days (that is, an extension to and including February 13, 2015) in which to file their opposition to defendants' motions to dismiss.

Respectfully Submitted,

/s/ John O'B. Clarke, Jr.
John O'B. Clarke, Jr.
HIGHSAW, MAHONEY & CLARKE, P.C.
4142 Evergreen Drive
Fairfax, Virginia 22032-1018
Phone: (202) 296-8500
Fax: (202) 296-7143
Email: jclarke@highsaw.com

Date: February 6, 2015

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of February, 2015, caused a copy of this Motion For An Extension Of Time to be served upon counsel for defendants through the Court's Electronic Case Filing system.

/s/ John O'B. Clarke, Jr.

John O'B. Clarke, Jr.